

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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CHESAPEAKE ENERGY CORPORATION, : Case No. 1:13-cv-1582-PAE
: Plaintiff, : ECF Case
: v. :
: THE BANK OF NEW YORK MELLON TRUST :
COMPANY, N.A. :
: Defendant. :
:-----X

**NOTICE OF DEFENDANT THE BANK OF NEW YORK MELLON TRUST
COMPANY, N.A.'S MOTION FOR FURTHER RELIEF UNDER 28 U.S.C. § 2202**

PLEASE TAKE NOTICE that, for the reasons set forth in the accompanying Memorandum of Law and Declaration of Lawrence S. Robbins, and upon the exhibits attached thereto, and the pleadings herein, defendant, by its undersigned attorneys, moves this Court before the Honorable Paul A. Engelmayer, United States District Judge, at the United States District Courthouse, 40 Foley Square, New York, NY 10007, for further relief pursuant to 28 U.S.C. § 2202, and for such other and further relief as the Court deems just and proper.

Dated: February 13, 2015
Washington, D.C.

Respectfully submitted,

/s/ Lawrence S. Robbins
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**Motions for admission pro hac vice
pending*